

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Lead Counsel for Plaintiffs and Class

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
RUNCIE DOOKERAN, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU and TAO  
THOMAS WU.

Defendants.

**CASE No.: 1:18-cv-00467-RJS**

**NOTICE OF MOTION OF  
NOELLE DUNPHY AND  
YUEJUN JIANG TO: (1)  
CONSOLIDATE RELATED  
ACTIONS; (2) APPOINT LEAD  
PLAINTIFFS; AND (3)  
APPROVE LEAD  
PLAINTIFFS' SELECTION OF  
COUNSEL**

**CLASS ACTION**

-----X  
-----X  
PENG LI, Individually and On Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU and TAO  
THOMAS WU,

Defendants.

**CASE No.: 1:18-cv-00646-RJS**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Plaintiffs Noelle Dunphy and Yuejun Jiang (“Movants”) hereby move this Court, the Honorable Richard J. Sullivan, United States District Judge, on a date and at a time designated by the Court, for an order:

- (a) consolidating the above-captioned related actions;
- (b) appointing Movants to serve as Lead Plaintiffs in this action; and
- (c) approving Movants’ selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movants submit: (1) the Memorandum of Law dated March 20, 2018 (and exhibits); and (2) a [Proposed] Order granting Movants’ Motion to Consolidate the Related Actions, to Appoint Lead Plaintiffs, and to Approve Lead Plaintiffs’ Selection of Counsel.

Dated: March 20, 2018

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim  
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[Proposed] Lead Counsel for Plaintiffs and Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of March 2018, a true and correct copy of the foregoing **NOTICE OF MOTION OF NOELLE DUNPHY AND YUEJUN JIANG TO: (1) CONSOLIDATE RELATED ACTIONS; (2) APPOINT LEAD PLAINTIFFS; AND (3) APPROVE LEAD PLAINTIFFS' SELECTION OF COUNSEL** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim